



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## TRANSMITTAL

DATE: September 29, 2011

REFERENCE NO.: 054046-D23107

PROJECT NAME: Occidental Chemical Corporation

Wichita, Kansas

TO: Mr. David Garrett

RCRA Corrective Actions and Permitting Branch

U.S. Environmental Protection Agency Region 7

901 N. Fifth Street

Kansas City, Kansas 66101

RCAP-RECEIVED

OCT 17 2011

Please find enclosed: ☐ Draft ☒ Final  
☐ Originals ☐ Other  
☐ Prints

Sent via: ☒ Mail ☐ Same Day Courier  
☐ Overnight Courier ☐ Other

QUANTITY	DESCRIPTION
2	Final Groundwater Monitoring Plan Table
2	KDHE Water Well Plugging Record – MW23S4
2	Hard copy of original 9/27/2011 email transmitting above items electronically

☐ As Requested ☐ For Review and Comment  
☒ For Your Use ☐ Other

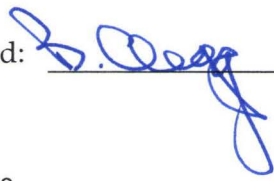
### COMMENTS:

As discussed on September 27, 2011, please see the attached hard copies for your use.

Copy to: Juan Somoano, GSHI  
Lisa Thurman, OCC  
Mike Dandurand, USEPA

Completed by: Bruce Clegg/lg/32

[Please Print]

Signed: 

Filing: Correspondence File

511300



RCRA

**2011 GROUNDWATER MONITORING PLAN  
OCCIDENTAL CHEMICAL CORPORATION  
WICHITA, KANSAS**

<i>Well Identifier</i>	<i>Rationale Used to Select Sampling Frequency</i>	<i>EPA's Decision</i>	<i>Response to EPA Comments</i>	<i>No of wells</i>	<i>Biennial</i>	<i>Annual</i>	<i>Semi</i>	<i>Omit</i>
IW29	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW30	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW31	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW32	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW35A	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW35B	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW36	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
IW40	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
IW41	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
IW42	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
IW43	Semi-annual monitoring to monitor concentrations for 2 years then review sampling frequency	--	Semi-annual monitoring to monitor concentrations for 2 years then review sampling frequency	1			1	
IW44	Semi-annual monitoring to monitor concentrations for 2 years then review sampling frequency	--	Semi-annual monitoring to monitor concentrations for 2 years then review sampling frequency	1			1	
MW02S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW02S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW02S3	Screen overlaps with MW02S2 abandon well	Agreed: Abandon	Implement into Work Plan					1
MW03S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW04S1	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW04S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling -all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW05S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW05S4	Well is continuously dry abandon well	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW06BR	Biennial sampling at bedrock locations based on lack of historic detections	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW06S1	Annual monitoring is sufficient at upgradient locations	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW06S3	Annual monitoring is sufficient at upgradient locations	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW07S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW07S2	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	

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OCCIDENTAL CHEMICAL CORPORATION  
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MW07S3	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW08S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW08S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW08S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW08S4	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Propose Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW09S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Propose Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW09S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Propose Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW09S4	Well is continuously dry abandon well	Disagree: Annual Sampling-all OCC Constituents of Concern and add to eDat	Propose Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW10S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW10S2	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW10S3	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW11S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW11S3A	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW11S3B	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Agreed: Omit from sampling program	Implement into Work Plan					1
MW12S1A	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW12S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW13S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW13S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW14S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW14S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW14S4	Well is continuously dry abandon well	Agreed: Abandon Well and add this well to eDat.	Implement into Work Plan					1
MW15S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW15S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	

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MW15S4	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW16BR	Biennial sampling at bedrock locations based on lack of historic detections	Agreed: Biennial Sampling -all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW16S1A	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW16S2PVC	Abandon well has the same screen interval as MW-16S2SS (duplicate location)	Agreed: Abandon Well	Implement into Work Plan					1
MW16S2SS	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW16S4	Abandon damaged well	Agreed: Abandon Well and Install an S4 Replacement Well	Implement into Work Plan	1		1		
MW17S1	Annual monitoring is sufficient at upgradient locations	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW17S3A	Annual monitoring is sufficient at upgradient locations	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW17S3B	Abandon damaged well	Agreed: Abandon damaged well and replace well.	Agreed, annual monitoring of replacement well	1		1		
MW18S1 *	Abandon lower aquifer well within source area as well is not double cased	Disagree: Install a new cased well to replace MW18S1 or MW27S1 and Annual Sampling for OCC Constituents of Concern	Propose to postpone any final determination until completion of the On-Site GW Investigation. However, well will be included in Annual Program until final determination is made.	1		1		
MW18S3 *	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW18S4 *	Well is continuously dry abandon well	Disagree: More information is needed. Few documented attempts to actually sample this well. Attempt to sample annually for OCC CoCs.	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW19S1 *	Abandon lower aquifer well within source area as well is not double cased	Disagree: Install a new cased well and Annual Sampling-all OCC Constituents of Concern	Propose to postpone any final determination until completion of the On-Site GW Investigation. However, well will be included in Annual Program until final determination is made.	1		1		
MW19S2 *	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW19S3 *	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW19S4 *	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW20S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW20S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW21S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW21S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW21S4	Abandon damaged well	Disagree: Install a replacement well.	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW22S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	

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MW22S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW22S4	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Propose Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW23BR	Biennial sampling at bedrock locations based on lack of historic detections	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW24S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW24S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW24S4	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW25S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW26S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW26S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW27S1 *	Abandon lower aquifer well within source area as well is not double cased	See well MW18S1 comment above	Propose to postpone any final determination until completion of the On-Site GW Investigation. However, well will be included in Annual Program until final determination is made.	1		1		
MW27S2 *	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW28S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW28S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW28S3	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW29S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW29S2	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW29S3	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW30S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW30S2	Omit; S2/S3 aquifer is monitored by adjacent monitoring well at this nested location	Agreed: Omit from sampling program	Implement into Work Plan					1
MW30S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW31S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW32S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		



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MW113S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern and add all BTEX data that was collected as part of the UST program	Implement into Work Plan	1		1		
MW114S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1		1		
MW130S1	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW130S2	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW130S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW131S2	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW131S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW132S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW132S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW133S2/S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	
MW134S2	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW134S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW135S1	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW135S2/S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Agreed: Biennial Sampling-all OCC Constituents of Concern	Implement into Work Plan	1	1			
MW136S2/S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW137S1	Omit well is screened in thin sand seam just above bedrock	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW137S2	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW137S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
MW138S1	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW138S2/S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW139S2/S3	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
MW140S1	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Agreed: Annual Sampling-all OCC Constituents of Concern	Implement Semi-Annual Sampling-all OCC Constituents of Concern to keep all wells within nested location on the same sampling frequency	1			1	
MW140S2/S3	Concentrations are not expected to change and annual sampling is sufficient to monitor remediation	Disagree: Semi-Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Semi-Annual Sampling-all OCC Constituents of Concern	1			1	

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MW141S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	--	Implement into Work Plan	1			1	
MW142S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	--	Implement into Work Plan	1			1	
MW143S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	--	Implement into Work Plan	1			1	
MW144S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	--	Implement into Work Plan	1			1	
MW145S2/S3	Semi-annual monitoring to monitor concentrations around plume perimeter	--	Implement into Work Plan	1			1	

**Abbott Labs and Air Products Monitoring Wells**

<b>Well Identifier</b>	<b>Rational Used to Select Sampling Frequency</b>	<b>EPA's Decision</b>						
AMW1	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW3	Omit from program as well is screened across several stratigraphic units	Agreed: Omit from Sampling Program	Propose to postpone any final determination on installing a replacement well until completion of the On-Site GW Investigation. However, well will be included in Annual Program until final determination is made.			1		
AMW4D	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW4S	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW5D	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW5S	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW8D	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW8S	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW16D	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW16S	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW101D	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW101I	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW101S	Omit from program as several other monitoring location are nearby to monitor the area	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW102D	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW102S	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW104	Omit from program as well is screened across several stratigraphic units	Agreed: Omit from Sampling Program	Propose to postpone any final determination on installing a replacement well until completion of the On-Site GW Investigation. However, well will be included in Annual Program until final determination is made.			1		

2011 GROUNDWATER MONITORING PLAN  
OCCIDENTAL CHEMICAL CORPORATION  
WICHITA, KANSAS

<i>Well Identifier</i>	<i>Rationale Used to Select Sampling Frequency</i>	<i>EPA's Decision</i>	<i>Response to EPA Comments</i>	<i>No of wells</i>	<i>Biennial</i>	<i>Annual</i>	<i>Semi</i>	<i>Omit</i>
AMW105D	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW105S	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW106D	Omit from program as several other monitoring location are nearby to monitor the area	Agreed: Omit from Sampling Program	Implement into Work Plan					1
AMW106S	Omit from program as several other monitoring location are nearby to monitor the area	Agreed: Omit from Sampling Program	Implement into Work Plan					1
AMW107D	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW107S	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
AMW108D	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
AMW108S	Biennial sampling at locations approx. 1/4-mile outside plume (several years transport time from plume)	Disagree: Annual Sampling-all OCC Constituents of Concern	Agreed - Implement Annual Sampling-all OCC Constituents of Concern	1		1		
APMW302S1	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
APMW302S2	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
APMW302S3	Semi-annual monitoring to monitor concentrations around plume perimeter	Agreed: Semi-Annual Sampling-all OCC Constituents of Concern	Implement into Work Plan	1			1	
			<b>Totals</b>	138	12	62	66	7

PZ40A	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ40B	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ40C	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ41A	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ41B	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ41C	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ42A	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ42B	Hydraulic monitoring only	Agreed	Implement into Work Plan
PZ43A	Hydraulic monitoring only	--	Implement into Work Plan
PZ44A	Hydraulic monitoring only	--	Implement into Work Plan
PZ44B	Hydraulic monitoring only	--	Implement into Work Plan
PZ44C	Hydraulic monitoring only	--	Implement into Work Plan
PZ44D	Hydraulic monitoring only	--	Implement into Work Plan

Notes:  
\* Monitoring well to be reassessed during On-Site Groundwater Investigation  
BR - Bedrock  
IW - Interceptor Well  
OCC - Occidental Chemical Corporation